## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

BRITTANY JONES, Individually	)	
and on behalf of those	)	
similarly situated,	)	
•	)	Case No. 2:17-cv-00571-JFC
Plaintiff,	)	
	)	
V.	)	Chief Judge Conti
	)	
SAMSUNG ELECTRONICS AMERICA,	)	
INC.,	)	Electronically Filed
	)	
Defendant.	)	
	)	

## <u>DEFENDANT'S MOTION TO COMPEL ARBITRATION, DISMISS CLASS CLAIMS, AND STAY ALL PROCEEDINGS</u>

AND NOW comes Defendant Samsung Electronics America, Inc. ("SEA") and moves this Honorable Court to enter an order compelling arbitration of Plaintiff's individual claims, dismissing the class claims, and staying this action pending the outcome of arbitration. This motion is based upon the accompanying Brief in support thereof; the Declaration of Joy McBeth and supporting Exhibits A-F; and all of the pleadings and documents in this action.

Defendant SEA is simultaneously moving to dismiss Plaintiff's claims under Federal Rule of Civil Procedure 12 but respectfully requests that this Court decide this motion to compel arbitration before ruling on the motion to dismiss.

Date: July 17, 2017 <u>s/Arthur H. Stroyd</u>

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